



Federal Regulatory Affairs

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October 21, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On October 21, 2011, Kathleen Q. Abernathy, Chief Legal Officer and Executive Vice President, Regulatory and Government Affairs, Frontier Communications, spoke on the phone with Eddie Lazarus, Chief of Staff for Chairman Genachowski, and Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski, to discuss the above-captioned proceedings.

Ms. Abernathy expressed Frontier's support for the America's Broadband Connectivity Plan ("ABC Plan") and Joint Framework filed in these dockets.<sup>1</sup> Ms. Abernathy explained the importance of the Plan's proposal to include an initial 10-year funding period for Connect America Fund recipients as this timeframe adds stability and substantially reduces risk for those companies accepting the obligations to deploy broadband to very high cost areas. Ms. Abernathy also explained the benefits of the ABC Plan's proposal for recovering revenues lost as a result of intercarrier compensation reform. Under the ABC Plan, those companies that experience significant revenue shifts would be able to recover the majority of their lost revenues with a 10 percent reduction only on recovery funds derived from the Universal Service Fund. Such a system allows for equitable recovery without overburdening any individual segment of consumers.

Please feel free to contact me with any further questions.

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<sup>1</sup> See Letter from Robert W. Quinn, Jr., AT&T; Steve Davis, CenturyLink; Michael T. Skrivan, FairPoint; Kathleen Q. Abernathy, Frontier; Kathleen Grillo, Verizon; and Michael D. Rhoda, Windstream; to Marlene H. Dortch, FCC, CC Docket Nos. 01-92, 99-200, 96-98, 99-68, 96-45; WC Docket Nos. 05-337, 07-135, 10-90, 03-109, 06-122, 04-36; GN Docket No. 09-51 (filed July 29, 2011).

Sincerely,

/s/

Michael D. Saperstein, Jr.  
Director of Federal Regulatory Affairs  
Frontier Communications  
(203) 614-4702

cc: Eddie Lazarus  
Zac Katz